

**DEFENDANTS' DESIGNATION OF BAMIDELE O. BOLAJI**  
 (Counter-Designations in italicized text)  
 June 13, 2005

Page/Line Cite	Plaintiffs' Objection & Counter (include specific page and line numbers of material objected to and objection(s))	Defendants' Response
5:12-14		
6:6-16	<i>Plaintiffs counter-designate 7:4-16</i> <i>OK</i>	
9:4-10		
9:17-22	<i>Plaintiffs counter-designate 10:11-12; 10:18-24; 11:9-18; 12:1-9; 12:23-14:9; 14:24-15:24</i> <i>OK</i>	See defendants' responses below.
10:11-12	Defendants' counter-designate 10:13-17 <i>OK</i>	
10:18-24		
11:9-18		
12:1-9		

SFL-597493v1

Chambers Copy

**DEFENDANTS' DESIGNATION OF RAMDELE O. BOLAJI**

*(Counter-Designations in italicized text)*

June 13, 2005

Page/Line Cite	Plaintiffs' Objection & Counter (include specific page and line numbers of material objected to and objection(s))	Defendants' Response
12:23-14:9	13:14-20: Hearsay, prejudicial and cumulative. FRE. 801-02, 401-403. 14:1-9: Hearsay, prejudicial. FRE. 801-02, 403.	Plaintiffs' Response: Plaintiffs' counter-designations are relevant to Plaintiff Bowoto's pain and suffering, testified to here by the nurse who attended and accompanied him to the hospital.
14:24-15:24	Improper Counter-Designation Objection. 14:24-15:15: Hearsay, prejudicial. FRE 801-02, 403.	Plaintiffs' Response: Plaintiffs' counter-designations are relevant to Plaintiff Bowoto's pain and suffering, testified to here by the nurse who attended and accompanied him to the hospital.
16:22-17:10		
17:21-18:16	<i>Plaintiffs counter-designate 18:22-25</i>	
19:1-12		
19:17-20:3		
20:8-9		



**DEFENDANTS' DESIGNATION OF BAMDLE O. BOLAJI**  
 (Counter-Designations in italicized text)  
 June 13, 2005

Page/Line Cite	Plaintiffs' Objection & Counter (include specific page and line numbers of material objected to and objection(s))	Defendants' Response
20:12-24	<i>Plaintiffs counter-designate 20:25-21:10</i> OK	
21:11-18		
21:21-22:11	Objection to 22:8-11: Non responsive. <i>Plaintiffs counter-designate 22:21-23:18 and 23:20-23</i> OK	22:8-11: This is necessary to provide a complete context for the deponent's response. Plaintiffs' counter-designation is incomplete because it omits 23:19. FRE 106. Plaintiffs' Response: Plaintiffs are unclear about Defendants' objection as 23:19 is a fragment of an answer.
24:2-13		
25:16-21		
32:1-5		
32:15-19		

**DEFENDANTS' DESIGNATION OF BAMIDELE O. BOLAJI**

*(Counter-Designations in italicized text)*

June 13, 2005

Page/Line Cite	Plaintiffs' Objection & Counter (include specific page and line numbers of material objected to and objection(s))	Defendants' Response
34:12-20	Improper Counter-Designation Objection. Hearsay, prejudicial. FRE 801-02, 403.	Plaintiffs' Response: Plaintiffs' counter-designations are relevant to Plaintiff Bowoto's pain and suffering, testified to here by the nurse who attended and accompanied him to the hospital.
35:13-36:1	Lacks foundation, improper opinion, prejudicial. FRE 602, 701, 702, 403. 	Plaintiffs' Response: This testimony consists of the percipient's observations of the nurse attending Plaintiff Bowoto and are relevant to his pain and suffering claims.
39:7-19		
46:1-11		
58:1-7		
58:11-59:1	Completeness designation: 59:2-12 	
61:1-17		

**DEFENDANTS' DESIGNATION OF BAMIDELE O. BOLAJI**  
**(Counter-Designations in italicized text)**  
**June 13, 2005**

<b>Page/Line Cite</b>	<b>Plaintiffs' Objection &amp; Counter (include specific page and line numbers of material objected to and objection(s))</b>	<b>Defendants' Response</b>
<b>83:16-84:10</b>		